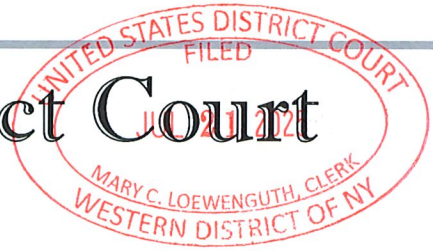


AO 91 (Rev. 02/09) Criminal Complaint

United States District Court
for the
Western District of New York



United States of America

v.

Case No. 25-MJ- 5165

Miguel Angel GUEVARA-MURILLO

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about June 28, 2025, in the Western District of New York, and elsewhere, the defendant, Miguel Angel GUEVARA-MURILLO, did knowingly produce, transfer, and possess document making implements, to wit, an Asus computer and access card printer, with the intent that such document making implements would be used in the production of false identification documents, and the production, transfer and possession of the document making implements was in and affected interstate or foreign commerce.

All in violation of Title 18, United States Code, Section 1028(a)(5).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

CHRISTOPHER B
OSWALD

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CHRISTOPHER B OSWALD
Date: 2025.07.18 16:00:45
-04'00'

Complainant's signature

CHRISTOPHER OSWALD
SPECIAL AGENT
HOMELAND SECURITY INVESTIGATIONS

Printed name and title

Sworn to before me and signed telephonically.

Date: July 21, 2025

Judge's signature

City and State: Buffalo, New York

HONORABLE MICHAEL J. ROEMER
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

I, **Christopher Oswald**, Special Agent of Homeland Security Investigations, United States Department of Homeland Security, having been duly sworn, states as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am employed as a Special Agent (“SA”) with the U.S. Department of Homeland Security, Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”), Buffalo, New York. As such, I am a law enforcement officer of the United States, within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in Title 18, United States Code, Section 2516.

2. I have been employed by HSI and the legacy organization since January 2010. I am currently assigned to the HSI Buffalo, Worksite Enforcement/Identity and Document Fraud group located in Buffalo, New York. I am a graduate of the Criminal Investigator Training Program and the HSI Special Agent Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. As a federal law enforcement officer, I have received formal, as well as on-the-job training, relative to immigration offenses, narcotics smuggling, controlled substances, money laundering, bulk cash smuggling, and other crimes that have resulted in arrests, indictments, and convictions.

3. I make this affidavit in support of a criminal complaint charging Miguel Angel GUEVARA-MURILLO with violating Title 18, United States Code, Section 1028(a)(5) (possession of a document-making implement with the intent such document-making implement will be used in the production of a false identification document). The information in the affidavit is based on my personal knowledge and upon reports and information received from other law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included every fact I have learned during this investigation.

FACTS SUPPORTING PROBABLE CAUSE

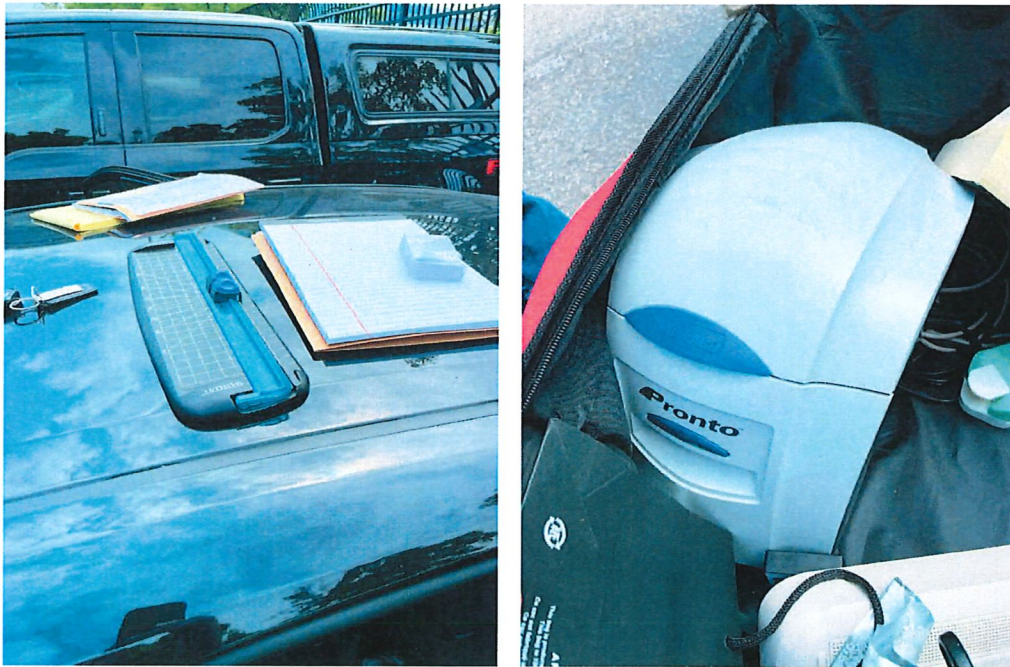
4. On June 28, 2025, a black Toyota Corolla with a California license plate was encountered at the Rainbow Bridge Port of Entry (POE) in Niagara Falls, NY after making a wrong turn into the POE from the United States. A Customs and Border Protection Officer (CBPO) found the vehicle occupied by two males, driver Miguel Angel GUEVARA-MURILLO and passenger Juan David GRAJALES-Mejia, both of whom provided their Columbian Passports to the Officer. The vehicle and occupants were referred to secondary inspection.

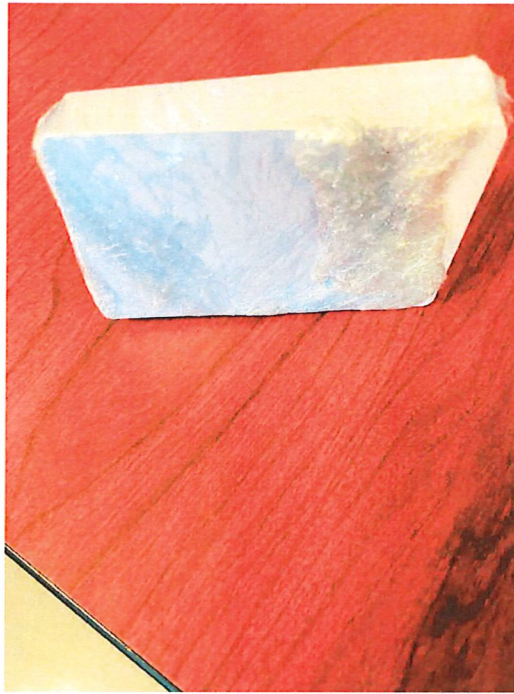
5. During secondary inspection, GUEVARA was found to be a citizen of Columbia who entered the United States without inspection in 2022, served with a notice to appear, and was released on parole.

6. Pursuant to CBP's border search authority, CBPOs conducted a search of the vehicle and discovered a black backpack on the driver side rear seat containing the personal belongings of GRAJALES. In the trunk of the vehicle, CBOPs found a black duffel bag, which

contained a counterfeit California driver's license with GUEVARA's photo and the name of Sean Patrick Allen, as well as numerous items that could be used to produce fake identification documents. The face of the driver's license with GUEVARA's photo was glued to a credit card.

7. On June 30, 2025, your affiant and HSI Task Force Officer (TFO) Mark Jann responded to the Rainbow Bridge POE to further investigate. Your affiant and TFO Jann located a red DoorDash tote inside the vehicle. The tote contained an Asus Laptop, an access card printer, blank plastic access cards, a scanner, a Westcott Multi-purpose paper cutter/ruler, and other items and documents. Based on my training and experience investigating document fraud, equipment such as this can be used to create fraudulent identity documents. Shown below are photos of some of the items found in the DoorDash tote:





8. On the same date, an interview of GUEVARA was conducted. The interview was conducted by your affiant, TFO Jann, and CBPO Dan Whitten. The interview was translated into the Spanish language by CBPO Emily Ramos. GUEVARA was advised of his *Miranda* rights in Spanish by CBPO Ramos by reading directly from a pre-printed waiver of rights form. GUEVARA signed the waiver of rights form and agreed to speak with agents and officers. In sum and substance, GUEVARA made the following statements:

9. GUEVARA admitted the document making equipment discovered in the vehicle belonged to him. GUEVARA stated he made counterfeit state identification documents, which he sold for \$250 to individuals who sought to work as drivers for DoorDash. GUEVARA stated that he only made the ID documents to create DoorDash accounts and did not provide the physical documents to anyone. GUEVARA stated he made between 50-100 IDs from California and other states but had not made U.S. immigration documents. GUEVARA stated he purchased the document making equipment from Amazon

and needed to make physical identification cards to bypass security features DoorDash employees during account creation.

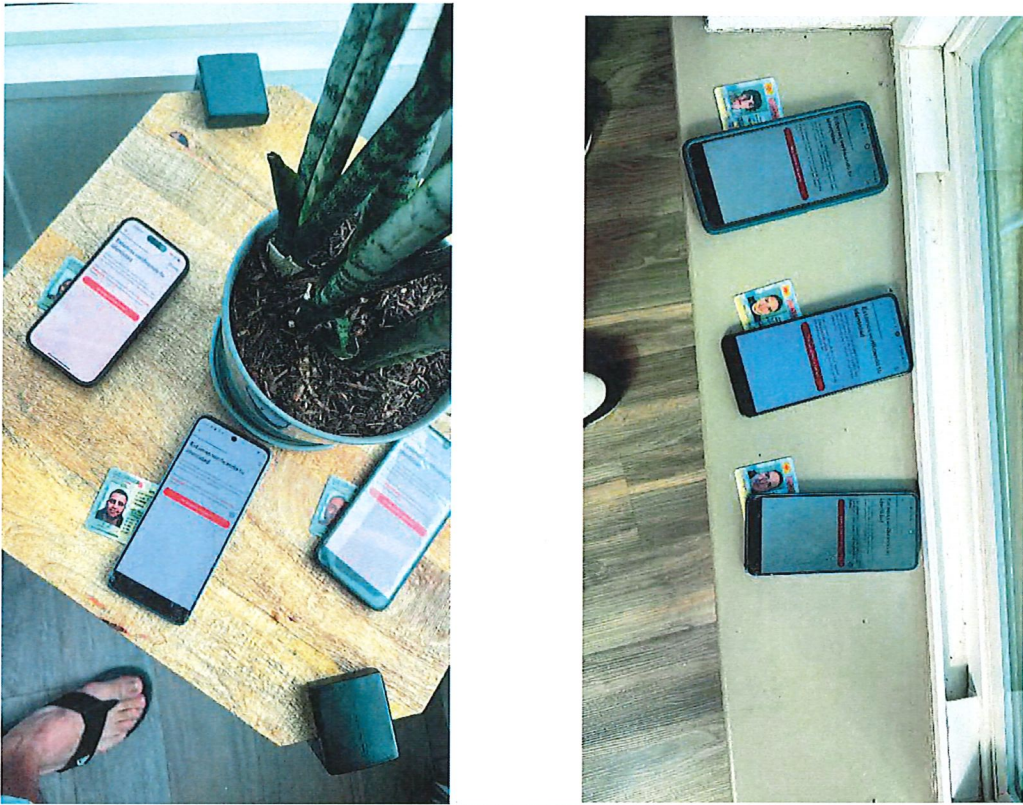
10. GUEVARA assisted your affiant in opening the access card printer during his interview. Inside the printer, two partially completed counterfeit California ID cards were discovered; the rear of each card was blank, and the cards were stuck in the printer. GUEVARA signed a consent to search form authorizing the search of his cell phone and laptop and provided the passwords for each.

11. Your affiant conducted a forensic examination of GUEVARA's cell phone and discovered several portrait photos of various individuals; photos of finished IDs from California and other states; photos of GUEVARA creating DoorDash accounts; and screen shots of Zelle money transfers.¹ Although the investigation is ongoing, at least one of these licenses has been confirmed to be counterfeit. Shown below is an example of a photo found on GUEVARA's phone showing the apparent creation of a fake New Mexico driver's license:

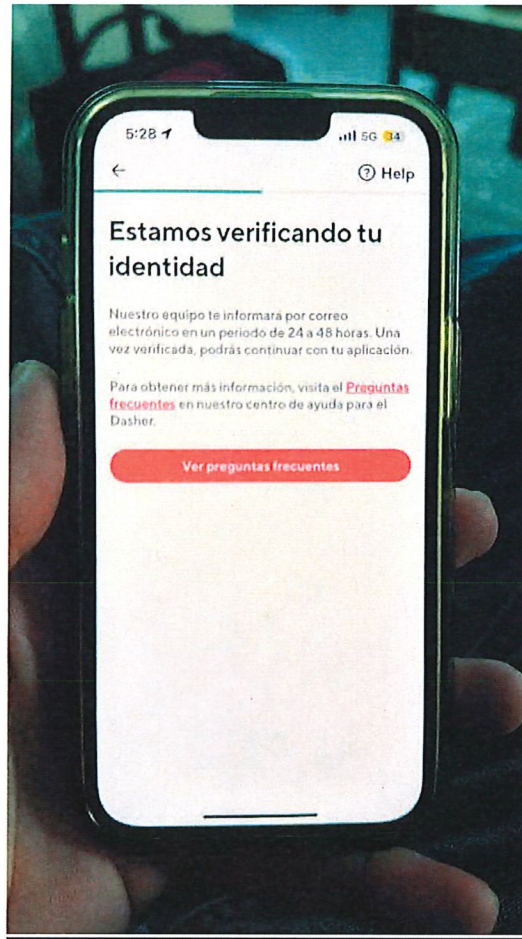
¹ An examination of the laptop has yet to be completed.



12. The Asus laptop shown in this photo appears to be the same Asus laptop found in GUEVARA's car. Several of these photos found on GUEVARA's phone show fraudulent driver's licenses next to a cell phone with a screen showing a website written in Spanish. Examples are shown below:



That website is shown below in another photo found on GUEVARA's phone:



13. This website was unofficially translated by a Border Patrol Agent who is fluent in Spanish. In substance, the website states that, “we are verifying your identity”; “[o]ur team will inform you via electronic mail in a period of 24-48 hours”; and “[o]nce it is verified, you will be able to continue your application.” Based on the information obtained during this investigation, I respectfully submit that these photos show that GUEVARA used the device-making equipment found in his car to create fraudulent driver’s licenses to enable individuals without driver’s licenses to work as DoorDash drivers.

CONCLUSION

WHEREFORE, I respectfully submit that the foregoing facts establish probable cause to believe that Miguel Angel GUEVARA-Murillo violated Title 18, United States Code, Section 1028(a)(5) (possession of a document-making implement)

CHRISTOPHER
B OSWALD

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CHRISTOPHER B OSWALD
Date: 2025.07.18 16:01:52
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Christopher Oswald, Special Agent
HSI Buffalo

Subscribed and sworn to before me
telephonically this 21st day of July 2025.



HON. MICHAEL J. ROEMER
United States Magistrate Judge